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December 26, 2017

VIA ECF AND FACSIMILE - (212) 805-7942

Hon. Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007

Re: *Haider et al., v. Uber Technologies, Inc. et al.*, 16-cv-4098 (AKH)

Dear Judge Hellerstein:

As the Court is aware, we represent Defendants in the above-referenced matter. After reviewing Plaintiffs' reply in support of their motion for conditional certification, we write to reassert our request that Your Honor schedule oral argument on Plaintiffs' pending motion, which was fully briefed as of December 19, 2017.

Defendants believe oral argument will help clarify certain issues for the Court, including various contentions raised in Plaintiffs' reply papers. For example, Plaintiffs assert in their reply that the conditional certification order in *Hood v. Uber Technologies, Inc.*, No. 16-cv-998 (M.D.N.C.) ("*Hood*") should not serve as a bar to conditional certification here because, among other things, *Hood* does not involve a "single New York Plaintiff." In fact, *Hood* involves a conditionally certified *nationwide* collective that completely subsumes the proposed collective in this case. Moreover, Anthony Valentino, a driver from New York City to whom Plaintiffs seek to send notice, filed a consent to join *Hood* on May 4, 2017.¹

Defendants would appreciate an opportunity to address this issue, and others, in more detail during oral argument.

We thank the Court for its time and consideration.

¹ A copy of Mr. Valentino's consent form is attached hereto as **Exhibit A**.

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Respectfully submitted,

Little Mendelson, P.C.

/s/ Andrew M. Spurchise

Andrew M. Spurchise

cc: All counsel of record (via ECF)